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6 *Attorneys for Defendant Wells Fargo Bank, N.A.,*  
7 *erroneously named as Wells Fargo Home Mortgage,*  
7 *Inc. and Wells Fargo Financial Nevada 2 Inc.*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 LAWRENCE SHADID and CLARICE  
11 SHADID,

12 Plaintiff,

13 v.  
14 WELLS FARGO BANK, N.A.; WELLS  
15 FARGO HOME MORTGAGE, INC.,  
15 WELLS FARGO FINANCIAL NEVADA 2  
16 INC., and EQUIFAX INFORMATION  
16 SERVICES, LLC,

17 Defendants.

Case No.: 2:17-cv-02662-APG-CWH

**STIPULATION AND ORDER TO  
CONTINUE DISCOVERY**

**[FIRST REQUEST]**

18 Under Fed. R. Civ. P. 26(f), and Local Rule 26-4, Plaintiffs Lawrence and Clarice Shadid  
19 (“Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”), erroneously named as Wells  
20 Fargo Home Mortgage, Inc. and Wells Fargo Financial Nevada 2 Inc., through their attorneys,  
21 stipulate to extend certain deadlines in the March 28, 2018 Scheduling Order. Plaintiffs and Wells  
22 Fargo are referred to as “the Parties.”

23 **1. Discovery Completed:**

24 Plaintiffs served their Initial Disclosures on February 23, 2018. Wells Fargo served its  
25 initial disclosures on February 21, 2018. On May 22, 2018, Plaintiffs served their First Set of  
26 Requests for Production of Documents and Interrogatories to Wells Fargo.

27 **2. Discovery to be Completed:**

28 Plaintiffs intend to depose Wells Fargo’s Rule 30(b)(6) witness, and Wells Fargo intends

1 to depose Plaintiffs. Wells Fargo also intends to serve Plaintiff with a set of requests for  
2 admission, interrogatories, and requests for production of documents.

3 **3. Reasons Why Discovery Not Completed Within Time Limits:**

4 Good cause supports this request to extend discovery as written discovery is well underway  
5 and the proposed extension will allow for sufficient time to conduct necessary, additional  
6 discovery, including depositions. The Parties are evaluating their respective claims and the  
7 prospect of settlement. As Wells Fargo needs more time to respond to Plaintiff's discovery  
8 requests and Plaintiff seeks to file a potential amended complaint should the parties not settle, the  
9 Parties request to continue the discovery schedule to allow each party the ability to timely exhaust  
10 all rights. No prejudice will occur to this Court or the Parties if granted. Thus, this stipulation is  
11 supported by good cause.

12 **4. A Proposed Schedule for Completing All Remaining Discovery:**

13 The Parties plan to complete the above discovery on the following schedule:

14 • Discovery Cutoff: October 15, 2018  
15 • Amending Pleadings/Adding Parties: July 16, 2018  
16 • Initial Expert Disclosures/Interim Status Report: August 15, 2018  
17 • Rebuttal Expert Disclosures: September 14, 2018  
18 • Dispositive Motion deadline: November 15, 2018  
19 • Joint Proposed Pretrial Order: December 14, 2018 or 30 days after decision on any  
20 dispositive motion.

21 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS  
22 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

23 The March 28, 2018 Scheduling Order shall be amended as follows:

24 • Discovery Cutoff: October 15, 2018  
25 • Amending Pleadings/Adding Parties: July 16, 2018  
26 • Initial Expert Disclosures/Interim Status Report: August 15, 2018  
27 • Rebuttal Expert Disclosures: September 14, 2018  
28 • Dispositive Motion deadline: November 15, 2018

1           •     Joint Proposed Pretrial Order: December 14, 2018 or 30 days after decision on any  
2 dispositive motion.

3           **IT IS SO STIPULATED.**

4           Dated: June __, 2018.	5           Dated: June __, 2018.
6           HAINES & KRIEGER, LLC	7           SNELL & WILMER L.L.P.
7           By: <u>/s/ Matthew Knepper</u> 8           Matthew Knepper, Esq. 9           Miles N. Clark, Esq. 10           KNEPPER & CLARK LLC 11           10040 W. Cheyenne Ave. 12           Suite #170-109 13           Las Vegas, NV 89129 14           Phone: 702.825.6060	8           By: <u>/s/ Karl O. Riley</u> 9           Kelly H. Dove, Esq. 10           Karl O. Riley, Esq. 11           3883 Howard Hughes Parkway, Suite 1100 12           Las Vegas, NV 89169
13           David Krieger 14           HAINES & KRIEGER, LLC 15           8985 S. Eastern Avenue 16           Henderson, NV 89123 17           Tel: (702) 880-5554	18 <i>Attorneys for Defendant Wells Fargo Bank, 19           N.A., erroneously named as Wells Fargo 20           Home Mortgage, Inc. and Wells Fargo 21           Financial Nevada 2 Inc.</i>

19           **ORDER**

20           **IT IS ORDERED THAT** the March 28, 2018 Scheduling Order shall be amended as  
21 follows:

22           •     Discovery Cutoff: October 15, 2018  
23           •     Amending Pleadings/Adding Parties: July 16, 2018  
24           •     Initial Expert Disclosures/Interim Status Report: August 15, 2018  
25           •     Rebuttal Expert Disclosures: September 14, 2018  
26           •     Dispositive Motion deadline: November 15, 2018  
27           •     Joint Proposed Pretrial Order: December 14, 2018 or 30 days after decision on any  
28 dispositive motion.

29           **IT IS SO ORDERED.**

30           Dated: June 13, 2018.

31             
32           \_\_\_\_\_  
33           UNITED STATES MAGISTRATE JUDGE